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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$24,900.00  
IN U.S. CURRENCY,

15

16 Defendant.

2:21-MC-00264-MCE-AC

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant  
19 Christopher Fluke (“claimant”), by and through their respective counsel, as follows:

20 1. On or about August 4, 2021, claimant filed a claim in the administrative forfeiture  
21 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
22 \$24,900.00 in U.S. Currency (hereafter “defendant currency”), which were seized on May 25, 2021.

23 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
24 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
25 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim  
26 to the defendant currency as required by law in the administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
2 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
3 That deadline was November 2, 2021.

4       4. By Stipulation and Order filed November 8, 2021, the parties stipulated to extend to  
5 December 30, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
7 to forfeiture.

8       5. By Stipulation and Order filed January 5, 2022, the parties stipulated to extend to February  
9 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

12       6. By Stipulation and Order filed March 1, 2022, the parties stipulated to extend to March 30,  
13 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
15 forfeiture.

16       7. By Stipulation and Order filed March 30, 2022, the parties stipulated to extend to April 29,  
17 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
18 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
19 forfeiture.

20       8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May  
21 30, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
22 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
23 forfeiture.

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1       9. Accordingly, the parties agree that the deadline by which the United States shall be required  
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
3 the defendant currency is subject to forfeiture shall be extended to May 30, 2022.

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5 Dated: 4/29/22

PHILLIP A. TALBERT  
United States Attorney

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7 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

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10 Dated: 4/29/22

/s/ Carolyn Hagin Emison  
CAROLYN HAGIN EMISON  
Attorney for potential claimant  
Christopher Fluke  
(Signature authorized by email)

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14 IT IS SO ORDERED.

15 Dated: May 2, 2022

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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE